

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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SAMSUNG ELECTRONICS CO., LTD.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 08-348 GMS
	:	
PETTERS GROUP WORLDWIDE, LLC,	:	
POLAROID CORPORATION, and	:	
WESTINGHOUSE DIGITAL	:	
ELECTRONICS, LLC,	:	
	:	
Defendants.	:	
-----X		

**PARTIALLY STIPULATED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT**

Defendants Polaroid Corporation (“Polaroid”) and Petters Group Worldwide, LLC (“Petters”), hereby jointly<sup>1</sup> request that the Court grant a sixty (60) day extension of time, until August 29, 2008, for Polaroid and Petters to answer or otherwise plead to the Complaint. Plaintiff, Samsung Electronics Co., Ltd. (“Samsung”) offers licenses to the four (4) patents alleged in this action against Polaroid and Petters through a patent licensing entity named MPEG LA. (see [www.mpegla.com](http://www.mpegla.com)). Polaroid and Petters are currently in licensing negotiations with MPEG LA regarding the four (4) patents at issue in this case, which would also include a license to many other patents, owned by many other companies. Since a license granted to Polaroid and Petters for the four patents at issue in this action would dispose of this case without any further litigation, Polaroid and Petters respectfully request this Court for the aforementioned sixty (60) day extension to attempt to negotiate and execute a license with MPEG LA.

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<sup>1</sup> Petters is the parent corporation of Polaroid.

Plaintiff, Samsung, only consents to a thirty (30) day extension of time, as well as up to an additional fifteen (15) day grace period after any breakdown of the present settlement discussions, to answer or otherwise plead. However, Polaroid and Petters believe that an extension of sixty (60) days will more thoroughly allow the parties to explore settlement, will better allow Polaroid and Petters to answer or otherwise plead if settlement discussions do break down, and will prevent the parties from having to come back to the Court to ask for additional time. Thus, Polaroid and Petters respectfully request that the Court grant a sixty (60) day extension of time, until August 29, 2008, for Polaroid and Petters to answer or otherwise plead to the Complaint.

MCCARTER & ENGLISH, LLP

Dated: June 26, 2008

By: /s/ Daniel M. Silver  
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WESTINGHOUSE DIGITAL	:	
ELECTRONICS, LLC,	:	
	:	
Defendants.	:	
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**ORDER GRANTING EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_ 2008, upon consideration of Defendants Polaroid Corporation and Petters Group Worldwide, LLC's Partially Stipulated Motion for Extension of Time to Answer or Otherwise Plead to the Complaint, and for good cause shown:

IT IS HEREBY ORDERED that Defendants Polaroid Corporation and Petters Group Worldwide, LLC are granted a sixty (60) day extension of time, until August 29, 2008, to answer or otherwise plead to the Complaint.

\_\_\_\_\_  
The Honorable Gregory M. Sleet